

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

NEW ENGLAND CARPENTERS )  
HEALTH BENEFITS FUND; PIRELLI )  
ARMSTRONG RETIREE )  
MEDICAL BENEFITS TRUST; )  
TEAMSTERS HEALTH & WELFARE )  
FUND OF PHILADELPHIA AND )  
VICINITY; and PHILADELPHIA )  
FEDERATION OF TEACHERS HEALTH )  
AND WELFARE FUND, )

Civil Action No. 05-CV-11148-PBS

Judge Patti B. Saris

Plaintiffs, )

v. )

FIRST DATABANK, INC., a Missouri )  
Corporation; and McKESSON )  
CORPORATION, a Delaware Corporation, )

Defendants. )

AFFIDAVIT OF DOREEN WEBER

I, Doreen Weber, being first duly sworn, deposes and says:

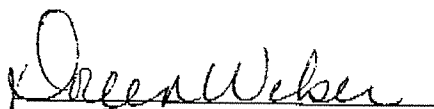
1. I am Clinical Manager of Client Benefits Clinical with Caremark Inc. Prior to the merger between Caremark Rx, Inc. and AdvancePCS in March 2004, I was an employee of AdvancePCS ("legacy AdvancePCS"), formerly Advance Paradigm, as a Clinical Pharmacist. I have personal knowledge of the facts set forth herein.

2. From January 1, 2002 through March 15, 2005 (the "time period"), legacy AdvancePCS used the First DataBank reporting service as the source of the average wholesale price or "AWP" when providing pharmacy benefit management services to a portion of its


customers. Specifically, First Databank was the source of AWP for approximately sixty percent of the mail and retail claims processed by AdvancePCS during the time period.

3. Legacy AdvancePCS used two different electronic claims adjudication platforms to process mail and retail claims during the time period, RECAP and RxClaim. First DataBank was the source of the AWP for claims processed on the RECAP platform. Medi-Span was the source of the AWP for claims processed on the RxClaim platform. I was able to determine the approximate percentage of claims processed using First Databank as the source of AWP by reviewing an aggregated summary of the number of mail and retail claims processed on each platform during the time period. It is possible to identify specific customers for which claims were processed on either the RECAP or RxClaim platforms during the time period using an automated procedure.

FURTHER AFFIANT SAYETH NOT.

  
Doreen Weber

Subscribed and sworn to before me this  
14 th day of July, 2006

  
Notary Public  
My Commission Expires: 5/31/08

